REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 32-35, 37-38 and 40-51 are pending in the application. Claims 32, 33, 35, 41 and 49-51 are amended; and Claims 1-31 and 52-63 are canceled without prejudice or disclaimer by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.[1] No new matter is presented.

In the outstanding Official Action, Claims 32, 35, 41, 44 and 49-51 were rejected under 35 U.S.C. § 112, first paragraph; and Claims 32-35, 37-38, and 40-51 were rejected under 35 U.S.C. § 103(a) as unpatentable over Brozowski et al. (U.S. Pat. 6,559,871, hereinafter Brozowski) in view of Berner et al. (U.S. Pat. 5,907,846, herein Berner).

The Office Action rejected Claims 32, 35, 41, 44 and 49-51 under 35 U.S.C. § 112, first paragraph, citing the phrase "objects which no portions thereof actually exist" as the basis for this rejection. Applicants note that Claims 32, 35, 41, 44 and 49-51 are amended to remove the above noted phrase, rendering the rejection under 35 U.S.C. § 112, first paragraph, moot.

Claims 32-35, 37-38, and 40-51 were rejected under 35 U.S.C. § 103(a) as unpatentable over Brozowski in view of Berner. In response to this rejection, Applicants respectfully submit that amended independent Claims 32, 35, 41 and 49-51 recite novel features clearly not taught or rendered obvious by the applied references.

The pending independent claims relate to an object content structure management method/computer program product for managing a content structure of a root object consisting of attribute data corresponding to a media file.

Specifically, amended independent Claim 32 recites, in part,

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[1] e.g., specification, at least at pp. 58-61.

> expressing the content structure of said ***root object***
> ***consisting of attribute data corresponding to a media file*** by a
> tree-structure set membership consisting of one or more
> objects, said one or more objects comprising one or more
> parent objects and one or more child objects, each child object
> respectively corresponding to one of said one or more parent
> objects...

Independent Claims 35, 41 and 49-51, while directed to alternative embodiments, are amended to recite similar features. Accordingly, the remarks presented below are applicable to each of amended independent Claims 32, 35, 41 and 49-51.

Applicants note the use of the closed term ***consisting of***, which indicates that the root object contains ***attribute data corresponding to a media file*** and no more.

Turning to the applied references, Brozowski describes an asynchronous tree navigator graphical user interface, which allows a user to asynchronously query for data and display the results of said query.[2]

Brozowski, however, fails to teach or suggest expressing the content structure of a ***root object consisting of attribute data corresponding to a media file*** by a tree-structure set membership, along with all the additional details related to managing the content structure, as recited in pending independent Claims 32, 35, 41 and 49-51.

Instead, Brozowski describes that his graphical navigator interface may be used to access a hierarchical data set stored on a distributed, geographically disbursed network, which may include a plurality of different servers interconnected by communications links.[3] Thus, Brozowski's navigation tree may be used to display and access files separately stored at each of a plurality of geographically disbursed devices, and is not described as being limited to representing data corresponding to a media file, as claimed. Instead, Brozowski clearly describes that the various branches in the tree are used to identify different application and/or files located at different devices on a network.

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[2] Brozowski, Abstract.
[3] Id., col. 7, ll. 40-55 and Fig. 3.

Accordingly, <u>Brozowski</u> fails to teach or suggest expressing the content structure of a root object *consisting of attribute data corresponding to a media file* by a tree-structure set membership, along with all the additional details related to managing the content structure, as recited in pending independent claims.
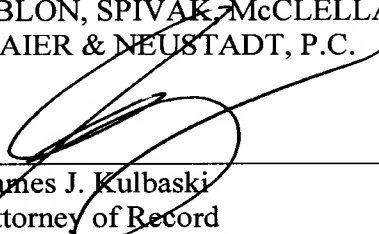
Similarly, <u>Berner</u> is directed to an object oriented system for accessing an external relational database from within an object oriented system, and is therefore also not limited to data corresponding to a media file, as claimed.

Accordingly, for at least the reasons discussed above, applicant respectfully requests that the rejection of independent Claims 32, 35, 41 and 49-51 (and the claims that respectively depend therefrom) under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 32-35, 37-38 and 40-51 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

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